

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

HANS MOKE NIEMANN,

Plaintiff,

vs.

SVEN MAGNUS ØEN CARLSEN A/K/A
MAGNUS CARLSEN, PLAY MAGNUS AS
D/B/A PLAY MAGNUS GROUP, CHESS.COM,
LLC, DANIEL RENSCH A/K/A “DANNY”
RENSCH, AND HIKARU NAKAMURA,

Defendants.

Case No. 4:22-cv-01110-AGF

**DECLARATION OF NIMA H. MOHEBBI IN SUPPORT OF DEFENDANT
CHESS.COM, LLC’S NOTICE OF COMPLIANCE**

I, Nima H. Mohebbi, hereby declare under penalty of perjury as follows:

1. I have personal knowledge of the matters set forth in this declaration and, if called as a witness, could and would testify competently thereto.

2. I am an attorney and a member in good standing of the State Bar of California. I am admitted pro hac vice to practice before this Court in this matter. I am a Partner with the law firm Latham & Watkins LLP, counsel of record for Defendant Chess.com, LLC (“Chess.com”).

3. I am aware of this Court’s March 22, 2023 Order permitting limited jurisdictional discovery regarding the citizenship of Chess.com’s members. ECF No. 114.

4. On March 23, 2023, counsel for Plaintiff Hans Niemann (“Niemann”) provided me by e-mail with certain requests for production and interrogatories directed at Chess.com.

5. Upon receiving the Court’s Order and Niemann’s jurisdictional discovery requests, I endeavored to assist Niemann’s counsel in eliciting information from Chess.com’s members and sub-members regarding the citizenship of their members and sub-members. I did so in an attempt


to conserve resources, potentially obviating the need for Niemann to issue third-party discovery to hundreds (or more) indirect owners of Chess.com.

6. In the course of this investigation, I connected with General Atlantic (CHS) Collections, LLC (together with affiliated investment funds and entities, “General Atlantic”), one of Chess.com’s members, and asked it to conduct an expedited inquiry into the citizenship of its own many members and sub-members. On information and belief, General Atlantic is a large investment fund with hundreds of constituents.

7. After several weeks of diligence, it was discovered that one of General Atlantic (CHS) Collections, LLC’s sub-members—an LLC located several levels above the entity investing in Chess.com—includes among the sub-member’s owners at least 10 individual members who are citizens of Connecticut. General Atlantic provided information, such as the names of the entities in the relevant ownership chain and the names of the individual Connecticut citizens at issue, under the express condition that it would remain subject to the strictest confidentiality protections. I then provided that information to Niemann’s counsel, Andrew Urgenson, who in turn requested documentary evidence of the same.

8. General Atlantic then provided documentation concerning these individuals’ entity membership and Connecticut addresses. On April 27, 2023, my firm produced to Niemann’s counsel—under an agreement to maintain confidentiality—the General Atlantic documents evidencing Connecticut citizenship of at least 10 Chess.com individual sub-members.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on this 4th day of May, 2023.



Nima H. Mohebbi